



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

April 4, 2025

By ECF

The Honorable Paul A. Engelmayer
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007-1312

Re: *William Cruz v. United States et al.*, 24 Civ. 817 (PAE)

Dear Judge Engelmayer:

This Office represents the United States and the Federal Bureau of Investigation (collectively, the "Government") in the above-referenced action. Plaintiff William Cruz ("Plaintiff") filed this action asserting claims under the Federal Tort Claims Act, 28 U.S.C. § 1346 *et seq.* The parties jointly write to respectfully request a one-month extension of the Government's deadline to respond to Plaintiff's pre-motion conference letter and a one-month adjournment of the case management conference that is currently scheduled for April 10, 2025.

Specifically, in the Court's February 19, 2025, Order, the Court scheduled a case management conference for April 10, 2025, and directed any party wishing to move for summary judgment to file a pre-motion conference letter by April 1, 2025. *See* Dkt. No. 24. Plaintiff filed a pre-motion conference letter in accordance with the Court's Order and, pursuant to the Court's Order, the Government's response to such letter is due on April 8, 2025. *See id.*

The parties jointly write to respectfully request a one-month extension of the Government's deadline to respond to Plaintiff's pre-motion conference letter, from April 8, 2025, to May 8, 2025, and a one-month adjournment of the case management conference from April 10, 2025, to May 12, 2025 (or at a time convenient for the Court thereafter). The reason for this request is that the parties are engaging in settlement discussions to potentially resolve this matter. The extension of time would permit the parties to continue their settlement discussions which, if successful, would obviate the need for further litigation in this matter.

We thank the Court for its consideration of these requests and attention to this matter.

Respectfully,

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/s/ Adam Gitlin

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GRANTED. The telephonic pre-motion conference is hereby adjourned until Monday, May 12, 2025 at 2 p.m., and the Government's response to plaintiff's pre-motion letter is due Thursday, May 8, 2025.

SO ORDERED.

Paul A. Engelmayer
PAUL A. ENGELMAYER
United States District Judge

April 4, 2025
New York, New York